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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BOBBI JO TWETEN,

15 Defendant.

Case No.: 2:22-CR-0088-TOR-1

PROTECTIVE ORDER

16 The United States of America, having applied to this Court for a Protective
17 Order regulating disclosure of the discovery materials and the confidential medical
18 information contained therein (the “Discovery”) to defense counsel in connection
19 with the Government’s discovery obligations, and the Court finding good cause
20 therefore, **IT IS HEREBY ORDERED:**

21 1. The United States’ Unopposed Motion for Protective Order Regulating
22 Disclosure of Discovery and Sensitive Information is **GRANTED**.

23 2. The United States is authorized to disclose the discovery including
24 sensitive information and materials (hereinafter “Discovery”) in its possession
25 pursuant to the discovery obligations imposed by this Court.

26 3. Government personnel and counsel for Bobbi Jo Tweten shall not
27 provide, or make available, the sensitive information in the Discovery to any person
28 except as specified in the Order or by approval from this Court. Counsel for
Protective Order – 1

1 Defendant and the Government shall restrict access to the Discovery, and shall only
2 disclose the sensitive information in the Discovery to their client, office staff,
3 investigators, independent paralegals, necessary third-party vendors, consultants,
4 and/or anticipated fact or expert witnesses to the extent that defense counsel believes
5 is necessary to assist in the defense of their client in this matter or that the
6 Government believes is necessary in the investigation and prosecution of this matter.
7 No copies of Discovery shall be left with their client.

8 4. Third parties contracted by the United States or counsel for Defendant
9 to provide expert analysis or testimony may possess and inspect the sensitive
10 information in the Discovery, but only as necessary to perform their case-related
11 duties or responsibilities in this matter. At all times, third parties shall be subject to
12 the terms of the Order.

13 5. Discovery in this matter will be available to defense counsel via access
14 to a case file on USA File Exchange. If necessary to review discovery with their
15 respective clients, defense counsel may download the discovery and duplicate only
16 once. Discovery materials may not be left in the possession of Defendant. In order
17 to provide discovery to a necessary third-party vendor, consultant, and/or anticipated
18 fact or expert witness, counsel for Defendant may duplicate the discovery only once.
19 No other copies may be made, by defense counsel or the defendant, without prior
20 approval from this Court.

21 6. All counsel of record in this matter, including counsel for the United
22 States, shall ensure that any party, including the Defendant, that obtains access to
23 the Discovery, is provided a copy of this Order. No other party that obtains access
24 to or possession of the Discovery containing sensitive information shall retain such
25 access to or possession of the Discovery containing sensitive information shall retain
26 such access to or possession unless authorized by this Order, nor further disseminate
27 such Discovery except as authorized by this Order or the further Order of this court.
28 Any other party that obtains access to, or possession of, the Discovery containing

1 discovery information once the other party no longer requires access to or possession
2 of such Discovery shall promptly destroy or return the Discovery once access to
3 Discovery is no longer necessary. For purposes of this Order, “other party” is any
4 person other than appointed counsel for the United States or counsel for Defendant.

5 7. All counsel of record, including counsel for the United States, shall
6 keep a list of the identity of each person to whom the Discovery containing sensitive
7 information is disclosed and who was advised of the requirements of this Order.
8 Neither counsel for Defendant nor counsel for the United States shall be required to
9 disclose this list of persons unless ordered to do so by the Court.

10 8. Upon entry of a final order of the Court in this matter and conclusion
11 of any direct appeals, government personnel and counsel for Defendant shall retrieve
12 and destroy all copies of the Discovery containing sensitive information, except that
13 counsel and government personnel may maintain copies in their closed files
14 following their customary procedures.

15 9. Government personnel and counsel for Defendant shall promptly report
16 to the Court any known violations of this Order.

17 10. The proposed Protective Order submitted by the Government only
18 applies to “sensitive information” pertaining to the search warrants sought and
19 obtained by the Government and records responsive thereto.

20 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
21 this Order and provide copies to counsel.

22 **DATED** this 13th day of December 2023.



A handwritten signature in blue ink that reads "Thomas O. Rice".

Thomas O. Rice
United States District Judge